

# Regional Continuum of Care Council

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## ESG CONSULTATION SUMMARY 2013

### I. CoC Responsibilities for ESG under HEARTH Interim rules

578.14

In consultation with recipients of Emergency Solutions Grants program funds within the geographic area, establish and consistently follow written standards for providing Continuum of Care assistance. At a minimum, these written standards must include:

- (i) Policies and procedures for evaluating individuals' and families' eligibility for assistance under this part;
- (ii) Policies and procedures for determining and prioritizing which eligible individuals and families will receive transitional housing assistance;
- (iii) Policies and procedures for determining and prioritizing which eligible individuals and families will receive rapid re-housing assistance;
- (iv) Standards for determining what percentage or amount of rent each program participant must pay while receiving rapid re-housing assistance;
- (v) Policies and procedures for determining and prioritizing which eligible individuals and families will receive permanent supportive housing assistance; and
- (vi) Where the Continuum is designated a high-performing community, as described in subpart G of this part, policies and procedures set forth in 24 CFR 576.400(e)(3)(vi), (e)(3)(vii), (e)(3)(viii), and (e)(3)(ix).

### II. Strategies Across ESG Areas

Four ESG Areas: HUD requires non-duplication of services funding

#### Region-wide Strategies

Through the consultation process, the RCCC and ESG Areas have established strategies for use of the ESG funds in ways that:

- **Further the accomplishment** of actions identified in the Consolidated Plan of each jurisdiction.
- **Foster greater access to permanent housing**, especially helping people access housing that is affordable at 30% area median income.
- **Leverage existing resources** to achieve the match and case management requirements and to avoid duplication of services.
- **Coordinate across jurisdictions for development of** standardized eligibility and assessment standards and by convening semiannual regional planning meetings.
- **Support federal and local goals for priority populations**, including but not limited to veterans, persons with disabilities, families and others.
- **Allow for variations in ESG entitlement programs** that respond to the needs and resources of the individual jurisdictions.

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- **Comply with eligibility and verification requirements and locally established standards** (HMIS, housing status, habitability standards, homeless definitions, etc.).
- **Allows each program to take responsibility** for program administration including compliance with public notice requirements and timely reporting.
- **Encourages all subrecipients to participate** in collaborative assessment, coordinated entry, data management, and reporting systems established by the CoC in accordance with HEARTH regulations.

## Region-wide Policies

### Homeless Management of Information System Participation

- ESG recipients must assure compliance with all HUD record-keeping provisions, including use of the HMIS. HUD requires that ESG recipients and providers enter client-level data into an HMIS.
- ESG, programs are required to keep a record of all clients that are screened and classified as ineligible. The ESG recordkeeping and reporting requirements state that for each individual and family determined ineligible to receive ESG assistance, the record must include documentation of the reason for that determination. (See 24 CFR § 576.500(d)). ESG regulation does not require that data about individuals or families determined to be ineligible be entered into an HMIS. (See 24 CFR § 576.400(f)). However, recipients/subrecipients may use an HMIS to retain this information.
- Beginning with the next round of ESG, ESG Areas that are fully contained within the San Diego CoC geography will meet obligations to participate in the designated HMIS system by entering into a vendor agreement with the HMIS Lead.

## Funding Obligations

- **Non-Duplication of ESG Funding:** ESG funds must benefit persons in the recipient ESG area. Funding from multiple ESG sources may not be used to duplicate services to a project or person.
- ESG subrecipients are responsible for assuring the provision of matching resources. The RCCC encourages subrecipients to leverage additional resources for effective operation of ESG programs. Funded organizations are required to report the sources of match and leverage funds annually. These resources are verified through annual review of CoC agency's Independent Audit as conducted in accord with HUD regulations.